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July 5, 2016

USDC SDNY

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EX PARTE

BY HAND

Honorable Laura Taylor Swain United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

Re: <u>United States v. Sean Stewart</u> 15 CR. 287 (LTS)

Dear Judge Swain:

I write on behalf my client, Sean Stewart, to request that you sign the enclosed <u>ex parte</u> Order directing the Winthrop University Hospital to permit defense counsel to inspect and photograph the building of Winthrop University Hospital, including the hallway and doorway of Room N344, located at 200 Old Country Road, Mineola, NY 11501. The requested inspection and photography is essential to the preparation of Mr. Stewart's defense. If the Court requires further information, I can proffer in more detail as to why the inspection is necessary.

If the Court grants our request, I respectfully request that chambers notify my paralegal, Megan Hauptman, at 212-417-8767 so that we may then pick up the Order from Your Honor's chambers.

Respectfully submitted,

Martin Cohen, Esq.

Attorney for Sean Stewart

212-417-8737